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ABSTRACT

Major issues concerning the Individualized Education Program (IEP) are reviewed and modifications are proposed. The history of the IEP and current legal requirements for developing IEPs are considered. Current issues with the IEP include the cost of development, the lack of parent involvement in IEP development, and the use of the IEP for accountability. The perceptions of three local special education administrators concerning the IEP and their recommendations for change are summarized. The administrators provided views on the following: problems with IEPs as they have been developed and used, ways to better use IEPs for accountability, ways to achieve accountability for results, the content and format of IEPs, aligning IEPs with general education, and increasing parental involvement. The administrators suggest that IEPs be restructured to become more functional for instruction and to reduce the emphasis on technical legal compliance. The IEP should also promote collaboration among teachers across the total school and better outcomes for students with disabilities. Appended is a list of 11 informational items that Public Law 94-142 requires in IEPs, a sample IEP form from Vermont, and a brief commentary on schoolwide IEPs by Edward Lee Vargas. (Contains 16 references.) (SW)

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INDIVIDUAL EDUCATIONAL PROGRAMS: ISSUES AND OPTIONS FOR CHANGE

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INDIVIDUAL EDUCATION PROGRAMS: ISSUES AND OPTIONS FOR CHANGE

INTRODUCTION AND PURPOSE

Few would dispute that the Individualized Education Program (IEP) is one of the hallmarks of the Individuals with Disabilities Education Act (IDEA), formerly the Education of the Handicapped Act (20 U.S.C. 1401 et seq.).

The IEP is the primary tool for implementing the concept of an appropriate education for students with disabilities (Smith, 1990). During the Congressional hearings leading to passage of P.L. 94-142, it became clear that the development of the IEP was intended to be the end result of a process that is as important as the IEP document itself (Zettel, 1982). This process offers the opportunity for teachers and other service providers, parents, and students to provide input into the development of a plan tailored to the student's individual educational strengths and requirements. As a result, parents and educators have come to rely on the IEP as the keystone of special education. Teachers and administrators also have come to rely upon the IEP as proof of compliance with IDEA procedures (Smith, 1990). As Smith (1990, p. 6) wrote, "...the IEP provided administrators with proof of compliance, teachers with formalized plans, parents with a voice, and students with an appropriate education."

The IEP has ben a powerful document which defines the specialized education and related services needed by students with disabilities. It focuses attention on the strengths and educational needs of individual students and has been suggested as a valuable tool for all students (Renzulli, 1994; Staub & Peck, 1994). Yet, after nearly 20 years experience in the use of the IEP, many feel that it is time to evaluate the effectiveness of the IEP for evaluating student progress, improving instruction, and as an accountability document.

This paper will provide an overview of some of the major concerns about IEPs that have emerged over the years, and will propose some modifications that can address those concerns. The recommendations were made by three local special education administrators who were asked to comment on their experiences with IEPs and to indicate what they view as the major problems as well as recommendations for changes. The administrators are: Charlene Green, Associate Superintendent for Special Education and Pupil Support Services, Chicago Public Schools, Chicago, IL; Jonathon McIntire, Assistant Superintendent for Pupil Personnel Services, Rutland Southwest Supervisory Union, Poultney, Vermont; and Edward Lee Vargas, Assistant Superintendent for Support Services, Santa Ana Unified School District, Santa Ana, California.

These three individuals were chosen because of their personal knowledge and experience administering local special education programs as well as because they represent districts that present specific challenges to developing appropriate special education programs. The districts will be discussed in greater detail in a later section of this paper.

The paper has three major sections. Section one provides an introduction to the IEP; section two reviews the history of the IEP, including research related to the implementation of IEPs; section three presents the comments and opinions of the three local special education administrators and their recommendations for changes.

CURRENT LEGAL REQUIREMENTS FOR DEVELOPING IEPs

IDEA states that an IEP is a written plan to be developed for each student with a disability in need of special education and related services. The IEP is to be developed in a meeting that includes a representative of the local educational agency, teacher, parent or guardian of the student, and when appropriate, the student. The IEP is to include a statement of the 1) present levels of educational performance; 2) annual goals, including short term instructional objectives; 3) specific educational services to be provided; 4) extent to which the student will be able to participate in general educational programs; 5) appropriate objective criteria, evaluation procedures, and schedules for determining on an annual basis whether the objectives are being met; 6) projected date for initiation and expected duration of services; and 7)transitional services for students ages 16 and older including a statement of interagency responsibilities and/or linkages (transitional services may be identified for students beginning at age 14 or younger as determined to be appropriate [20 U.S.C.A. 1401(a)(20]).

The regulations that define the process and content for IEPs have remained fairly constant since the initial passage of P.L. 94-142. Reauthorizations of IDEA have resulted in few changes in the IEP requirements other than to include a focus on transitional services for older students. Since the federal regulations governing IEPs are broad, states have fairly wide latitude in determining how the IEP document will be formatted (Zettel, 1982). While many states voice concerns about the format of their IEP, few have moved toward developing a more user-friendly format.

As Congress is about to engage in another reauthorization of IDEA, it is important to review what has been learned over the past 20 years about the IEP as well as how this very important document might be modified to be even more effective. What is evident is the importance placed on the IEP by parents, guardians, and representatives of students with disabilities as both a legal guarantee of their child's education as well as the product of an important process of parent/school collaboration.

THE IMPLEMENTATION OF THE IEP

History

During the Congressional hearings leading to passage of P.L. 94-142, it became clear that the development of the IEP was intended to be the end result of a process that was extremely valuable - perhaps as valuable as the IEP document itself (Zettel, 1982). The process of developing the IEP was intended to offer the opportunity for a group of involved individuals, including the parent (and, when appropriate, the child) to provide input into the development of a plan that was tailored to the unique educational strengths and needs of a particular student.

With the passage of the Act, considerable controversy arose throughout the educational community about a number of issues (Zettel, 1982). There were general concerns about the intrusion of the federal government into educational practices that had traditionally been left to the discretion and oversight of states and local school districts. While advocacy groups representing students with disabilities were encouraged by the passage of this law, other groups such as local administrators and school boards, as well as state legislators, saw increasing demands on tight education budgets (Levine & Wexler, 1981). Many educators voiced concern over what they considered to be the extraordinary amount of time that would be required to develop IEPs-time that would come at the expense of instruction. Other concerns voiced about IEPs focused on the logistical difficulties involved in convening parents, teachers, and related service providers to develop IEPs (Levine & Wexler, 1981).

A number of studies were conducted in the decade following passage of P.L. 94-142 to ascertain whether these concerns were valid. During spring, 1978 Research Triangle Institute (Pyecha, 1980) analyzed 2,650 IEPs from 208 school systems in 42 states. Ninety five percent of the special education students' files included IEPs. In the first year of implementation of P.L. 94-142 however, the IEP documents were deficient in several areas. For example, fewer than a third of the IEPs contained all of the required informational items (see Appendix A). The items most commonly missing were the proposed evaluation criteria and a statement of the extent to which the student would be able to participate in a general education program. Also, while the vast majority of students had IEPs, the documents were not developed with the appropriate multi-disciplinary team membership, did not reflect consideration of the Least Restrictive Environment (LRE), and parents rarely participated in the decision-making process.

Beginning in the 1978-79 school year, Stanford Research Institute (Wright, Cooperstein, Renneker, & Padilla, 1982) conducted a four-year study of 22 LEAs in nine states. Case studies were developed from interviews with LEA staff and community members including parents and human service agency staff. Those interviewed reported that

their district's initial effort were directed at ensuring procedural compliance with timely evaluation and IEP development requirements. Initially, this experience was very time consuming and demanded a great focus on detail, but most districts were able to put these procedures in place rather quickly. Administrators were then able to concentrate on expanding their scope of services and continuum of program options. However, as financial resources became tighter in the early 1980s, the expansion of services slowed and programs stabilized. The emphasis shifted to providing basic special education services in specific types of programs, and there were fewer and fewer new or emerging programs and services.

In addition to these studies, the results of the U.S. Office of Education on-sight monitoring visits for 1979 provided similar findings. Virtually all educational facilities surveyed had IEPs in place. However, most documents reflected similar weaknesses in the areas of the inclusion of required information items and adequate participation of parents and school personnel in the IEP meeting. These early studies pointed to the difficulties of fully implementing the requirements and intents of the IEP. However, the experiences of the three local administrators suggest that districts did settle into the IEP requirements, including involving parents and general educators in the development of the IEPs. Nonetheless, a review of research (Smith, 1990) conducted over the decades following the passage of P.L. 94-142 point to persistent problems with the document.

Current Issues with the IEP

Development of the IEP

Concerns about the development of IEPs generally appear to focus on the cost of the development activities, both fiscal costs as well as lost instructional time, and the lack of parental involvement in the development of the IEP document.

Development costs for IEPs are estimated at $2,000, adjusted for 1989-90 dollars (Chaikind, Danielson, and Brown, 1993). These costs primarily reflect the human resource investment for the assessments and participation in IEP meetings.

Another issue concerning IEP development is the lack of participation of key individuals. According to 20 U.S.C. 1401(a)(20), the IEP is to be developed by a multi-disciplinary team comprised of the student's teachers and other support staff, LEA representative, and parent(s). While special educators are virtually always present during the meetings, in most jurisdictions general educators rarely participate (Gartner & Lipsky, 1992). Yet, their presence is particularly important if special education is to provide students with disabilities the necessary supports to access the general education curriculum (Utah State Department of Education, 1993). Not having general classroom teachers on the IEP development team makes it very difficult to link special and general education and

often results in limited instructional usefulness of the IEP. In fact, teachers frequently report that they do not have copies of students' IEPs in their classrooms. In many instances, teachers have never seen the completed document.

Another critical participant on the IEP development team is the parent. Increasing evidence (Gartner & Lipsky, 1992; Harry, Allen, & McLaughlin, 1995; Singer & Butler, 1992) has documented minimal involvement of parents. Although parents may be present during the meetings, their participation is typically that of a passive recipient of information rather than as collaborator. Frequently, annual goals and objectives have been developed prior to the IEP meeting and there is only a cursory discussion of them. Parents have limited opportunity to suggest changes or explore options. When parents are faced with this situation, they report feeling intimidated by both the process and the content of the IEP.

While meaningful parental participation is a concern throughout the country, there is growing evidence (Harry, et al., 1995; Katsiyannis & Ward, 1992) that participation patterns vary by socioeconomic status and race. Parents of lower socioeconomic status and those of traditionally underrepresented groups (e.g., African American, Hispanic, Native American) are likely to be less involved in the IEP process. Reasons for this include logistical difficulties (e.g., scheduling, transportation, childcare) as well as parents feeling intimidated by members of the IEP team. This is particularly true for parents with culturally and linguistically diverse backgrounds (Harry, et al., 1995; Vincent, 1992). Despite the less than optimal participation rates, parents continue to support the critical value of the IEP as the vehicle for helping them understand their child's educational program.

Current Uses of the IEP

The IEP was originally conceptualized as a vehicle or plan for supporting students with disabilities in the curriculum, which was primarily viewed as the "general education" curriculum (Smith, 1990). However, for many students with disabilities, the IEP has come to define the total curriculum (Pugach & Warger, 1993) offering few linkages with the general education curriculum (Giangreco, Dennis, Edelman, & Cloninger, 1994). In fact, the major problems most often cited with current IEPs center on goals that are written for staff rather than students, goals that are discipline referenced rather than connected to the broader curriculum, and goals that lack connection to instruction in the general education classroom (Giangreco et al., 1994).

Unfortunately, IEPs are rarely linked to larger state, district, or school-level student outcomes and indicators. As a result, IEPs have often contributed to the development of fragmented system where students with disabilities are taught skills that are only tangentially related to the broader general education curriculum and are disconnected from a system of general education school improvement and reform.

As students with disabilities have been increasingly educated in general classrooms, more and more attention has been given to developing IEPs that are relevant to general classroom instruction. Although IEPs appear more connected to the general education curriculum, their change is superficial, with minimal change in actual content (Giangreco et al., 1994). Typically, the IEPs for students (particularly those with severe disabilities) in inclusive settings tend to reflect higher quality ratings (e.g., functional, age-appropriate activities), yet they do not differ significantly in content from IEPs developed for students in separate special education settings. The lack of connection between IEPs which define special education and the general education curriculum can be particularly critical for students with mild disabilities because it further separates them from instruction and acquisition of skills that are well within their reach (Singer & Butler, 1992). The IEP offers a unique opportunity to properly align special and general education and to ensure that students with disabilities do not receive a fragmented or piecemeal education.

The IEP as an Accountability Document

Process Accountability

Currently, one of the major function of the IEP is to document that school districts have complied with the legal requirements regarding evaluations and timelines as well as parent participation. Often, in an effort to demonstrate that they have crossed the T(s) and dotted the I(s) and to avoid litigation, school districts have created excessive paperwork demands. For example, multiple forms are often attached to the IEP document indicating that parents have been informed about specific procedures or have agreed to certain educational programs or conditions. In some school districts it is not unusual for parents to be required to sign at least 10 forms confirming their notification of the meeting, participation, acceptance of goals, receipt of document, receipt of parental rights statement, etc.

Because the IEP represents a legal guarantee of specific services, some researchers have found that it is not unusual to find that only those services available in a school or school district included in the document, regardless of the individual needs of students (Tucker, Goldstein, & Sorenson, 1993). The focus on legal culpability can get in the way of open and "parent friendly" conversations about an individual students strengths and educational needs (Harry, et.al., 1995).

Linkages to Outcome-based Accountability

Of increasing national concern is the significantly large number of students with disabilities who are exempted from involvement in systems of accountability (Brauen,

O'Reilly, & Moore, 1994). These include local and state-wide assessment systems that are used to evaluate school and LEA effectiveness in supporting students toward meeting the desired outcomes. These accountability systems typically focus on student participation (e.g., attendance, promotion/retention, suspension/expulsion) and student performance (e.g., minimum competency, and more advanced critical thinking and synthesis skills). The exclusion of large numbers of students with disabilities has resulted in a lack of any locus of accountability for their educational programs. Yet, the IEP is often considered to be the accountability instrument for students with disabilities.

The IEP has considerable potential to be the means to ensure accountability for student results. However, given the extensive evaluation requirements of the IDEA and the focus within the IEP document on presenting student diagnostic or evaluation information, it can be quite difficult to devote adequate attention to documenting the effectiveness of the services specified on the IEP (Schrag, 1994). There is debate about whether this lack of attention to results-oriented accountability is a result of lax implementation activities, a preoccupation with procedural compliance, or a lack of sufficient language in the IDEA statute or regulations. Nevertheless, it is clear that the IEP was always intended to provide the vehicle to bring parents and professionals together in order to design individual, tailored educational programs for students with disabilities. It is also clear, that the IEP was always intended to provide evidence that students are progressing toward their goals and objectives. The framework of the IEP may be sound, but in many instances; the practices have strayed. Therefore, many agree that there is a need to refocus the IEP on accountability for student outcomes or to link those to broader state or local outcomes.

Summary

In summary, the IEP is one of the most important provisions of P.L. 94-142. For the last 20 years, the regulations governing IEPs have remained essentially unchanged. With increased focus on the creation of schools that support students with diverse learning styles (including those with disabilities), it is time to revisit the framework supporting the IEP. How should it be developed? By whom? How often? How can it be linked to the general education curriculum to ensure continuity of instruction? How can the IEP be incorporated into systems of accountability so that students with disabilities have equal access to quality education as do their non-disabled peers?

As part of the effort to examine the IEP in practice, the following section will summarize the comments and recommendations of three experienced local special education administrators.

THE IEP: PERCEPTION OF THREE LOCAL ADMINISTRATORS

Three local special education administrators were asked to comment on their experiences with the IEP, and to make recommendations for how the IEP might be improved to better meet the needs of students with disabilities and their families. The three administrators, Charlene Green, Jonathan McIntire, and Edward Lee Vargas, were selected primarily because of their reputations for being thoughtful and forward thinking in the area of special education. These individuals were also chosen because their districts represent some particular challenges to implementing quality special education services. Both Chicago (Charlene Green) and the Santa Ana (Edward Lee Vargas) Public Schools are racially, ethnically, and economically diverse, with many families living below the poverty level and large numbers of students and family members who speak languages other than English. In contrast, Poultney, Vermont is ethnically homogeneous (about 98% of the residents are white) but economically diverse, with many families living below the poverty level. The ruralness of the district demands innovation and creativity to provide many of the required services needed by students with low incidence disabilities.

A conference call with the three administrators and the authors was conducted in November, 1994 to discuss issues and recommendations. The discussion began with each administrator delineating what they saw as the biggest issues with IEPS. This was followed by an open discussion of recommendation for changes. A draft of the paper was reviewed by the administrators and revisions were made. (In advance of the conference call, each administrator was sent a compilation of the issues and recommendations which were summarized from the professional literature and policy position papers.)

The purpose of involving the three administrators was to obtain a deeper understanding of the positive features of IEPs as well as the day-to-day implementation problems. There was no intention to make claims about the perspectives of local administrators nationally. The comments are summarized under each question posed to the administrators.

Are IEPs a Valuable Concept?

Absolutely, said two of the administrators; perhaps only for those students with the more significant educational needs said a third person. Two administrators consider an IEP important as a document for parents. It is the means by which schools explain and ensure that parents understand what educational services their son or daughter will be receiving. In addition, the IEP is an important mechanism for accountability...one that these administrators consider under-utilized by federal and state monitors.

The individual who expressed some reservations agreed that the IEP has been very valuable and is still of use. However, in this administrator's district there are a number of students eligible for multiple special programs, including bilingual and compensatory education. The IEP cannot serve as a unifying document for all of these special services nor does it connect to the overall school improvement plan a school has developed. In fact, this person feels that the IEPs of many students with mild disabilities often serve to separate the services that special education will provide from all other instruction. The result, in this person's opinion, is that we deliver education in isolation and create fragmented services, duplication and inefficiency. We also undermine collaboration and cooperation among staff from different disciplines, schoolwide improvement initiatives, and deny special educators the benefits which come from systemic reform efforts, including emphasizing innovation and creativity to improve the quality of learning for all students. General educators are moving forward with accelerated and enriched curriculum and proven instructional approaches like thematic instruction, cooperative learning, and authentic assessment while special educators maintain a narrow view of student ability and a microscopic view of instruction. According to this administrator, effective schools could use IEPs schoolwide.

Are there Problems with IEPs as they have been Developed and Used?

Absolutely, say all three administrators. The primary focus for an IEP should be to articulate what is best for a student-not what the adults need for purposes of compliance. Yet, the IEPs in the three districts have become encumbered with obscure language and sign-offs designed to comply with formal legal requirements. For example, in Vermont extensive litigation during the mid-1980s mandated an IEP document that was a minimum of ten pages in length. Informal data collection in several Vermont school districts found that to complete the document and comply with various aspects of the IEP development process, special education teachers were spending 30% to 45% of their time in meetings and completing paperwork.

The legal language and focus on process is not well understood by parents, and also creates the legal, adversarial tone that all three administrators feel exists during the development or negotiation of most IEPs. Furthermore, loading the IEP with the legal requirements consumes time, intimidates parents and teachers, and removes the document even further from instruction. Time for teachers and parents to work together in more substantive ways is reduced by the process requirements, and teachers have little time to engage in reflection and collaboration designed to enhance instruction.

How can IEPs be better Used for Accountability?

All three individuals consider the IEP a critical tool in holding the district

accountable for providing appropriate special education services. In fact, McIntire views the IEP as an important lever that can be used to ensure that school districts remain committed to special education. All three administrators would like to see even more accountability required of local districts by Special Education Agencies (SEAs). However, they want to see this emphasis on accountability for high standards and achieving the educational goals on the IEPs. Currently, they feel that there is little emphasis on student growth or progress because SEAs do not monitor districts on the basis of student results or measures of student progress. Neither schools or individual teachers perceive an obligation to demonstrate that a student is making reasonable progress. As a result, all three administrators have been frustrated by IEPs which contain the same or similar goals and short-term objectives year after year, and which are not truly individualized. In the larger districts they also see students locked into dead-end programs with little emphasis on content and high expectations. However, McIntire noted that his district is small enough to permit him to monitor IEPs more closely for student progress. He is also able to work with teachers to ensure that they are not lowering expectations for students with disabilities, and that they are designing instruction that leads to positive student outcomes and academic growth.

The low expectations and limited educational opportunities offered to many students with disabilities exist at a time when major reform initiatives are being implemented in general education to create challenging content standards, improve instruction, and increase expectations for all students. While the IEP has provided the illusion of accountability, the document needs to be reinvented to facilitate accountability for student results. According to McIntire and Vargas, the document should be used in both special and general education.

How can Accountability for Results be Achieved?

Several ideas were expressed for linking accountability to results as part of the IEP. First, all three administrators believe that SEAs must begin to monitor local districts on the basis of student progress or results. Green suggested that the SEA examine very closely the IEPs and the actual educational experiences of a random sample of students within a district. The IEPs of these students should be reviewed and progress should be clearly documented through multiple assessment strategies. In addition, the students should be observed in classrooms and teachers, parents, principals, and other key individuals should be interviewed to document how well the student is learning, not solely how well the system followed procedures. Vargas also believes that IEPs should be reviewed in the context of schoolwide improvement efforts to ensure that students with disabilities are not being excluded from systemwide school improvement efforts including assessment and accountability programs.

Generally, all three administrators noted the need to link the IEP to schoolwide and systemwide goals and assessments. They considered this to be important if students with

disabilities are to have the opportunity to access a rich general curriculum aligned with high standards. Green believes that the IEP should be linked to school or district-wide standards with appropriate modifications. While high standards increase opportunities for all students and systemwide assessments ensure that schools are accountable for students with disabilities, the IEP should still determine how students can best meet those standards. Green believes that careful consideration must be given to how students with severe cognitive disabilities will meet district standards. While she endorses the belief that all students with disabilities should have an opportunity to participate in a broad and balanced curriculum and should be assessed against those standards, the IEP still can determine the individual expectations for students with disabilities.

On the other hand, one of those interviewed would like to see schools given the opportunity to be more innovative with the IEP and to experiment with the concept of a "schoolwide" IEP for students with mild disabilities who spend the majority of their instructional day in general education classrooms. The schoolwide IEP would focus on the collective needs of these students within the context of the general classrooms and would require documentation of student progress using district assessments. These IEPs would be linked to school improvement plans. (See Appendix C for a more detailed description of the concept of "Schoolwide IEPs.") Streamlined individualized plans could also be developed.

The proponent of these schoolwide IEPs believes that this strategy could create ownership for students with disabilities at the school level, hold the school accountable for the progress of students with disabilities, and harness the energy and resources of the school to improve educational programs for all students. Another by-product of this concept would be the break down of the separation of special education from general education. All teachers would share the same agenda for instruction, and teacher isolation and alienation would be reduced.

According to this administrator, looking at schoolwide improvement would not detract from individual needs. Since every child's progress would be monitored, there is motivation for all teachers to strategize about how to improve instruction and help individual learners. In this model, the IEP meeting would change from a special education event to one in which general educators are required to identify the special education services and supports. In fact, this process is now beginning in some of the IEP development meetings in Vermont. In these instances, the special educator becomes a case manager for the IEP and general educators would engage in planning instruction and developing goals and evaluations.

These suggestions regarding how to improve accountability also relate to comments concerning improvements in the content and format of IEPs.

Should the Format of the Required Contents of the IEP be Changed?

There was a consensus that a number of changes are needed, beyond those which would improve accountability. One major change should be to reduce the emphasis on small splinter skills and simplify the process for IEP development by removing the requirements for two short-term objectives for each IEP goal. IEPs would state the specific goals - which could be annual goals with benchmarks for six month periods. All three administrators felt that specifying short-term objectives was an exercise in rhetoric. The objectives as stated are often very limited in scope and expectations and educators rarely use these objectives to develop instructional programs for students. For example, specifying "By June, 1995, the student will be able to use prefixes and suffixes successfully at an 80% level, as measured by teacher evaluation, when provided with ten sentences" is an extremely limiting concept that often becomes the year-long instructional content for a student. All three administrators believe that this represents micro-management of instruction.

Such longer term goals might be, "the student will improve his reading comprehension by two grade levels by June, 1995" or " "achieve writing proficiency to some specified district standard by June, 1995". If the IEPs move to larger goal statements that define meaningful outcomes, teachers could experiment and be innovative in their efforts to stimulate student programs toward goal attainment over six months, or one or two-year periods. If this change is coupled with a shift toward a focus on monitoring for student progress rather than compliance with process, the value and function of the IEP would be greatly enhanced.

However, one person did express some concerns about the shift away from short-term objectives. This administrator feels that the objectives are frequently the most explicit statements of what a student will be expected to accomplish. This means that parents are more likely to understand, through these short-term objectives, the focus of the special education services. She cautioned that removing these could be confusing for parents, unless the goal statements are explicit and parents understand the benefit of this shift for their son or daughter. She also believes that much of what we now do as part of special education programs is confusing to parents. Therefore, the IEP should become even more explicit and personalized to help parents better understand the specialized instruction and special education services being offered to their child.

Another suggestion offered by one person was to streamline the IEPs of students who are receiving only speech and language services or few special education services. A "speech only" IEP would require a review of a student's medical history and current status as well as a review of academic history and current status. However, goals and objectives would be developed based only on a speech and language assessment. The document would require less information, and fewer individuals would need to be involved in developing the IEP.

How else might the Content of IEPs be Aligned with General Education?

Generally, all three administrators indicated that in addition to eliminating short-term objectives, the content of the IEPs should also be defined in terms of what a student will need to learn relative to his or her functioning in a general classroom environment. That is, goals could be aligned with the academic and social expectations of particular classrooms. This means that evaluations and other assessments must address general education requirements and the general curriculum. Specifically, the assessment process should attend to the content and instructional demands of the general curriculum and, identify the supports that are necessary for the student's successful inclusion in that curriculum to the extent possible.

The IEP should be the map of services and accommodations that are required throughout the school day that will enable the student with a disability to be successfully included within the least restrictive environment. According to all three individuals, the IEP needs to articulate the specialized content and instruction that is required. However, both special and general education teachers should share responsibility for providing the specialized instruction and related services and for making necessary accommodations. The IEP would indicate when during the day an accommodation (more time, a different instructional technique, etc.) might be required in order for the student to participate in a classroom activity such as math or reading.

How might Parent Participation be Increased?

One administrator was most adamant that IEP documents and the way in which IEPs are developed must become more user friendly to parents. In this person's opinion, parent participation in IEP development is largely pro forma; often the IEP is completed prior to the meeting with the parent or is sent home to be signed. Two individuals attribute this, in part to the difficulties in having and entire team sit down at one time and draft an entire IEP. As IEPs are currently structured, this process would require setting aside several hours, which neither teachers nor many parents have. Yet, one administrator suggested a need for more earnest attempts to obtain information from the parents. A suggestion was to use a parent report form that could be sent home in advance of the meeting to solicit input directly from the parent or which could be used by social workers or school/family liaisons to obtain input. According to the administrator who suggested this approach, a pre-IEP questionnaire should be kept very simple perhaps asking only one question: "What do you hope your child will learn in school during this next year?" Such a document might even encourage more parents to attend meetings because they feel more focused and more prepared. In addition, there was consensus among all three administrators that there is a need for more staff training in working with families from different cultures and a need for more interpreters. All of these strategies will be required to be in place before families feel

more welcome and comfortable about participating in IEP development.

In addition, in the opinion of one individual who was interviewed, if parent involvement is to truly increase and become more meaningful, IEP development must move beyond the current episodic and ritualistic event which occurs once a year. Teachers and other specialists must be continuously given training and assistance in working with parents and parents must have general invitations to become part of the school. This includes joint teacher and parent training in IEP development as well as other topics. An example of a document and process that is more friendly to parents is a revised IEP format that has been developed in Vermont. The revisions were made in response to frustrations with the previous 10 page document that parents and educators found unwieldy and less than useful. A state committee developed a three page IEP (see Appendix B) that is primarily narrative and essentially asks three focusing questions: "What do we know about this student? What are we going to do for this student? How are we going to know how well we're succeeding?" The IEP development process consists of a conversation among members of the team which is recorded and or written. (Usually this meeting lasts 45 minutes to 1 hour). The essential pieces of information are extracted and written, and everyone reviews and revises the document at the conclusion of the meeting. The whole process is considered to be a comfortable and focused conversation between parents, teachers, and other specialists that results in a useful document.

CONCLUSION AND RECOMMENDATION

The comments and recommendations of Green, McIntire, and Vargas validate and expand those findings and recommendations which have accumulated in the literature during the past 20 years. In summary, IEPs need to be restructured to become more functional instructional documents and to reduce the emphasis on technical legal compliance and provide a framework for promoting effective instruction. The IEP should also promote collaboration among teachers across the total school and better outcomes for students with disabilities. The specific recommendations of the three individuals are in some instances similar to those of the National Association of State Directors of Special Education (December, 1994), the Council for Exceptional Children (1994), and others (Council of Administrators of Special Education, 1991) who have made recommendations related to IEPs for the reauthorization of IDEA. These include:

- linking IEPs to schoolwide improvement efforts and district and state goals and assessments;

- linking IEPs to the curriculum and instructional expectations of the general classroom;

- shifting state-level monitoring to student results or outcomes;

- streamlining the IEP document by removing the requirement for short-term objectives and focusing on more flexible goal statements. In other words, reduce micro-management of the instructional process;

- create an IEP development process in which special educators become case managers and collaborate with general educators in defining long-range instructional goals and instructional strategies;

- enhancing meaningful parent participation through pre-IEP home contacts, creating more conversational documents, and permitting the IEP to be more evolutionary than an annual "event";

- creating options for pilot efforts to experiment with "schoolwide" IEPs for all students in a building, including those student receiving part-time or less complex special education or related services.

In some areas the recommendations are made more salient given the positions of the individuals who were involved in this conversation. For example, the appeal for greater accountability and monitoring for results on the part of SEAs speaks to the desire of the local district administrators to increase their leverage on local schools to improve instruction for students with disabilities. While some of the recommendations are bold, there were also reminders that IEPs were intended to be both the mechanism through which parents can participate and contribute to the development of their child's educational program as well as the explicit statement of what special education services and programs will be provided based on the individual needs of a student. Provisions such as eliminating short-term objectives and linking IEPs to systemwide educational outcomes or goals can offer an opportunity for greater connection to general education and instructional relevance. However, they should not come at the expense of the original intent of the IEP.

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APPENDIX A

Informational Items for Inclusion on IEPs as Required in P.L. 94-142

Informational Items for Inclusion on IEPs as Required in P.L. 94-142

1. a statement of the present level of educational performance;
2. a statement of annual goals;
3. a minimum of two short-term instructional objectives;
4. a statement of the specific educational services to be provided;
5. the projected date for the initiation of these services;
6. the anticipated duration of the services;
7. a statement of the extent to which the child will be able to participate in the general education program;
8. evaluation criteria;
9. proposed evaluation procedures;
10. proposed schedules for determining whether the objectives are met; and
11. assurances of at least an annual evaluation.

APPENDIX B

Sample IEP Format
Vermont Department of Education

IEP Manager _____ IEP Meeting Date ____ (month) ____ (day) ____ (year)

Individualized Education Program

Student Name _____

Birth Date _____ Identification #: _____

School _____ Grade Assigned (EEE–12) ____

Initiation and Duration of Services: ____ (month) ____ (day) ____ (year) to ____ (month) ____ (day) ____ (year)

to

____ (month) ____ (day) ____ (year) ____ (month) ____ (day) ____ (year)

Annual Review ____ (month) ____ (day) ____ (year) Next 3–Year Reevaluation Due ____ (month) ____ (day) ____ (year)

IEP Meeting Participants

Teacher:

Name _____

Position _____

Parent/Guardian/Surrogate:

Name(s) _____

_____

LEA Representative:

Name _____

Position _____

Student (age 16 & older):

Name _____

Transition Service Provider:

Name _____

Position _____

Other Participants:

Name _____

Position _____

Name _____

Position _____

Name _____

Position _____

Name _____

Position _____

Name _____

Position _____

Definitions and Comments

Special Education:

"Special education" means specialized instruction, at no cost to the parent to meet the unique needs of an eligible student with a disability including classroom instruction, instruction in physical education, home instruction, and instruction in hospitals and institutions.

Related Services:

"Related Services" include transportation, developmental, corrective and other supportive services required to assist a student with a disability to benefit from special education (for example: occupational therapy, physical therapy, and counselling, etc.).

Duration of Services:

The special education and related services will be delivered during the school calendar year on a schedule set forth in the IEP.

Skill Areas:

Skill areas include Basic Skill Areas (e.g. reading, oral expression), Fundamental Skill Areas (e.g. cognitive, social), or any other curriculum areas needed by the student (e.g. vocational, recreational, non-verbal communication). The student's needs for socialization, language and behavior development must be considered.

Teacher:

The teacher can be the student's special education teacher or regular education teacher. For the initial IEP, the teacher can be the student's teacher or a teacher qualified in the area of the student's disability. Either the teacher or the LEA Representative should be qualified in the area of the student's disability.

Local Education Agency (LEA) Representative:

The LEA representative is a representative of the public agency, other than the student's teacher, who is qualified to provide or supervise the provision of special education services and who is authorized to allocate services.

Evaluation Personnel:

For a student being evaluated for the first time, the public agency shall ensure that a member of the evaluation team participates in the IEP meeting.

Parochial or Independent School Staff:

Staff from the parochial school or independent school in which the student is enrolled should be present at their student's IEP meeting.

Individual Education Program - Accountability:

Each public agency must provide special education and related services to a child with a disability in accordance with an IEP. However, State and Federal regulations do not require that any agency, teacher, or other person be held accountable if a child does not achieve the growth projected in the annual goals and objectives.

Transition Services:

As used in this part, "transition services" means a coordinated set of activities for a student, designed within an outcome-oriented process, that promotes movement from school to post-school activities, including post-secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation.

Least Restrictive Environment:

Each public agency shall insure that to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are nondisabled; and that special classes, separate schooling or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

Continuum of Placements:

Alternative placements such as instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions are available to meet the special education needs of students with disabilities.

INDIVIDUALIZED EDUCATION PROGRAM DESCRIPTION

Student Name _____

What do we know about _____	What are we going to do to help _____ receive an appropriate education?	How will we know if we are succeeding?
Include present levels of performance, the student's unique characteristics and needs and/or personal educational goals.	Include special education and related services, personnel, frequency, duration, location, and amount of service, and if necessary, accommodations, transition services, or other services and activities.	Include goals and objectives, which include evaluation procedures, objective criteria, and the expected dates for accomplishment.

IEP PLANNING GUIDE/CHECKLIST

Student Name: _____ IEP Meeting Date: / /

DID YOU REMEMBER TO:

1. Record the date of initiation of services and the duration?
2. Plan an adaptive physical education program for those students who cannot participate in the regular physical education program? (not applicable for essential early education).
3. Document parent participation if parents were not in attendance?
4. Discuss the applicable section(s) of the Parental Rights in Special Education?
5. Indicate the percent of time the student participates in the regular education program? If you have not, indicate the information below.

_____
_____
_____
_____

6. Consider the full continuum of alternative placements? Please document your Least Restrictive Environment (LRE) discussion below.

_____
_____
_____
_____
_____

7. Indicate by marking with an (R) the goals and objectives which address the reintegration of the student into the regular education environment for those students who are removed from the regular education environment for more than 50% of the time.
8. Discuss transition issues for those students 16 years of age and older by planning services based on individual needs, taking into account the student's preferences and interests, and including instruction, community experience, and development of employment and other post-school adult living objectives?
9. Provide a rationale if the team feels that transition services are not needed in instruction, community experiences, or the development of employment and other post-school adult living objectives? Please provide a rationale below.

_____
_____
_____
_____
_____

10. Take other steps to ensure that the student's preferences and interests are considered if the student did not attend the meeting. If an agency was invited to send a representative to a meeting and did not do so, what other steps did you take to obtain their participation in the planning of any transition services?

_____
_____
_____
_____

APPENDIX C

Why Schoolwide IEPs?
by Edward Lee Vargas
Santa Ana Unified School District

Why Schoolwide IEPs?

by Edward Lee Vargas

A schoolwide IEP could be a one to two page document developed and agreed upon by an entire staff that represents a concerted schoolwide effort to build ownership for the education of students with disabilities and help to create conditions in the school for realizing positive innovation and changes in special education. A schoolwide IEP could have one goal which states "to improve the overall educational performance of all students with disabilities from previous years." The schoolwide IEP could:

- Provide a framework for a schoolwide action plan for improving services to special education students

- Coordinate and align school based programs and services to support students with disabilities schoolwide

- Commit available resources (i.e., Chapter I, Migrant Ed, Bilingual Ed) for special education students who also qualify for these programs and generate funding to include in the school's schoolwide IEP

- Define the measurable outcomes that would be used to assess progress (i.E., improved academic achievement, parent involvement, a school climate of support, increased involvement in extracurricular activities, etc.)

Building ownership and support for special education students is critical to meaningful improvements in special education. The schoolwide IEP could reflect shared goals for students with disabilities and pave the way for bold new initiatives in this area. The creation of a schoolwide IEP could be a shared action plan that would engage all of the relevant constituencies from the school and community, including parents, general and special education teachers, school administrators, business partners, and community and civic partners, in moving the total special education program forward. This is important because simply revising existing IEPs under the current paradigm, is like rearranging the chairs on the deck of a sinking ship. It does not commit the school and culture to supporting students with disabilities.

Schoolwide IEPs would focus on enhancing learning for students receiving special education throughout the entire school day, not just while they're receiving special education services:

a) Special education students spending the majority of their day in general education will strive for academic gains which are comparable to their nonspecial education

peers.

b) Students with disabilities will be assessed frequently during the school year (i.e., using agreed upon measures to determine by the teachers and parents to ensure gains commensurate with nonspecial education peers).

c) Students with disabilities in general classes will be given opportunities to learn using multiple strategies and support from each classroom teacher.

d) The school will evaluate its progress of all special education students relative to overall student performance to ensure that the same high standards are available to all.

e) Collaboration among all staff will need to promote holistic services for students with disabilities.

Schoolwide IEPs could supplant less meaningful portions of the individual IEP and supplement other parts and would not take away from the procedural safeguards. For example, a schoolwide IEP could be developed by the total school and include an attachment for individual students indicating present levels of performance. This could be reviewed at agreed upon times to measure student progress. The focus of discussion would not be to micromanage instruction in special education, but on improving the performance of all students through collaboration.